

EXHIBIT B



U.S. Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section

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July 6, 2018

VIA FEDERAL EXPRESS

Nina Perales
Mexican American Legal Defense and Educational Fund
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San Antonio, TX 78205

Carlos Moctezuma Garcia
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McAllen, TX 78502

Re: *Texas, et al., v. United States et al., and Perez, et al.*, No. 1:18-cv-00068 (S.D. Tex.)
Document Production (Production Volume 001, 002)

Dear Counsel:

Please see enclosed document production for Production Volume 001, Bates number DEF-00000001 through DEF-00004595 and Production Volume 002, Bates number DEF-00004596 through DEF-00007079. A password will be sent to you via e-mail message. The privilege log associated with these production volumes will be sent via separate correspondence.

In the production, Defendants have withheld the contact information for government employees: e-mail addresses and office and mobile phone numbers, agency intranet website addresses, and the personally identifying information for Deferred Action for Childhood Arrivals recipients and requestors. In addition, Defendants have withheld from production draft documents and non-responsive family members.

Although the parties have not entered into a protective order, Defendants expect that the parties will only use the produced documents in furtherance of this litigation. In addition, Defendants reserve the right to designate the documents contained in these production volumes as Confidential if the parties later enter into a protective order. As such, Defendants have marked documents as Confidential. Defendants ask that Defendant-Intervenors acknowledge receipt of this letter via e-mail message to lead counsel for Defendants.

Texas, et al., v. United States et al., and Perez, et al., No. 1:18-cv-00068 (S.D. Tex.)

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Goldsmith". The signature is fluid and cursive, with the first name "Aaron" and last name "Goldsmith" clearly distinguishable.

AARON S. GOLDSMITH
Senior Litigation Counsel
United State Department of Justice

Cc:

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